

Julie E. Oelsner, State Bar No. 125432  
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Law Corporation  
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Sacramento, California 95814  
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Attorneys for Intech Mechanical

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In Re:	Case No.: 19-30088 (DM)
PG&E CORPORATION	Chapter 11
and	(Lead Case)
PACIFIC GAS AND ELECTRIC COMPANY,	(Jointly Administered)
Debtors.	

INTECH MECHANICAL'S NOTICE OF PERFECTION OF LIEN  
(11 U.S.C. §§ 546 and 362)

TO THE CLERK OF THE BANKRUPTCY COURT, THE DEBTORS, AND ALL OTHER  
INTERESTED PARTIES, AND THEIR ATTORNEYS OF RECORD:

You are hereby notified that Intech Mechanical (hereinafter "Intech") hereby perfects and continues to perfect, under 11 United States Code Sections 546(b) and 362(b)(3), its mechanic's lien in the principal amounts, after deducting all creditors and offsets, of \$148,453.30 for labor, equipment, material, and services provided by Intech generally described as electrical construction and related materials, labor, equipment, and services, incorporated in and constituting improvements to the real property commonly known as PG&E VCOC Building 4 – Const. HVAC, 4940 Allison Parkway, Vacaville, California 95688. The

1 purported owner of the property in question is Pacific Gas & Electric Co., 1850 Gateway  
2 Boulevard, 7<sup>th</sup> Floor, Concord, California 94250. Intech furnished the above-described labor,  
3 equipment, materials and services at the special instance and request of, and pursuant to a  
4 contract with Turner Construction Company, 1211 H Street, Sacramento, California 95814.  
5 This Notice constitutes the legal equivalent of having recorded a mechanic's lien and then  
6 having commenced a suit to foreclose upon the mechanic's lien. A true and correct copy of  
7 Intech's lien is attached hereto as *Exhibit A*.

8 You are further notified that Intech intends to enforce the lien to the fullest extent  
9 allowed by bankruptcy law and California law. This pleading does not constitute an admission  
10 as to the necessity of any such seizure or commencement.

11 Dated: March 6, 2019

weintraub tobin chediak coleman grodin  
law corporation

14 By: /s/ Julie E. Oelsner  
15 Julie E. Oelsner, State Bar No. 125432  
16 Attorneys for Intech Mechanical  
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## PROOF OF SERVICE

I am a citizen of the United States, employed in the City and County of Sacramento, California. My business address is 400 Capitol Mall, 11<sup>th</sup> Floor, Sacramento, California 95814. I am over the age of 18 years and not a party to, nor interested in, the within action. On March 6, 2019, I caused to be served the following:

### INTECH MECHANICAL'S NOTICE OF PERFECTION OF LIEN

United States mail by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing mail in accordance with this office's practice whereby the mail is deposited in a United States mailbox after the close of the day's business.

United States First Class mail by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing mail in accordance with this office's practice whereby the mail is deposited in a United States mailbox after the close of the day's business.

By personally delivering, or causing to be delivered, a true copy thereof to the persons at the addresses set forth below.

X CM/ECF Participants

I declare under penalty of perjury that the foregoing is true and correct. Executed March 6, 2019, at Sacramento, California.

/s/ Brenda Jennings  
Brenda Jennings

Exhibit A

# **CALIFORNIA PRELIMINARY NOTICE**

**THIS NOTICE IS GIVEN PURSUANT TO CALIFORNIA CIVIL CODE SECTIONS 8034(a), 8102, 8200 ET SEQ.**

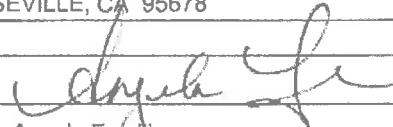
**THIS IS NOT A LIEN. THIS IS NOT A REFLECTION ON THE INTEGRITY OF ANY CONTRACTOR OR SUBCONTRACTOR.**

**YOU ARE HEREBY NOTIFIED:**

**DATE: January 4, 2017**

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

**I**  
**N F** Intech Mechanical Company LLC  
**D O I** 7501 GALILEE ROAD  
**I R R** ROSEVILLE, CA 95678  
**V M**  
**I**  
**D**  
**U**  
**A**  
**L**

BY:   
 Angela Familia  
 AP/AR Manager

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment

to perform HVAC work per

Subcontract dated 11/18/16,

Project # 161159, & Work Order 4700077375.

JOB NAME AND LOCATION: PG&E VCOC-BLDG 4 CONST. HVAC

4940 ALLISON PARKWAY

VACAVILLE, CA 95688

Relationship to the parties

of the one giving this notice Subcontractor

THE NAME AND ADDRESS OF THE PERSON WHO CONTRACTED FOR THE PURCHASE OF (PRIVATE WORKS) OR WHO WILL BE FURNISHED (PUBLIC WORKS) SUCH LABOR, SERVICES, EQUIPMENT OR MATERIAL IS:

TURNER CONSTRUCTION COMPANY  
1211 H STREET  
SACRAMENTO, CA 95814

TO: OWNER, REPUTED Pacific Gas & Electric Company  
 OWNER OR 245 Market Street  
 PUBLIC ENTITY San Francisco, CA 94111

\*TO: DIRECT Turner Construction Company  
 CONTRACTOR OR 1211 H Street  
 REPUTED Sacramento, CA 95814  
 CONTRACTOR

TO: LENDER, NONE  
 REPUTED LENDER,  
 OR SURETY

TO: SUBCONTRACTOR NONE

\*\*\*\*\* NOTICE TO PROPERTY OWNER \*\*\*\*\*

**EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL**, if the person or firm that has given you this notice is not paid in full for labor, service, equipment, or material provided or to be provided to your construction project, a lien may be placed on your property. Foreclosure of the lien may lead to loss of all or part of your property. You may wish to protect yourself against this by (1) requiring your contractor to provide a signed release by the person or firm that has given you this notice before making payment to your contractor, or (2) any other method that is appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a statement of your legal rights. This notice is not intended to reflect upon the financial condition of the contractor or the person employed by you on the construction project. If you record a notice of cessation or completion of your construction project, you must within 10 days after recording, send a copy of the notice of completion to your contractor and the person or firm that has given you this notice. The notice must be sent by registered or certified mail. Failure to send the notice will extend the deadline to record a claim of lien. You are not required to send the notice if you are a residential homeowner of a dwelling containing four or fewer units.

TRUST FUNDS TO WHICH SUPPLEMENTAL FRINGE BENEFITS ARE PAYABLE:

Sheetmetal Workers of North.

CA Pension Trust Fund

(MATERIAL MEN NOT REQUIRED TO FURNISH THE ABOVE)

Estimated total price of the labor, services, equipment, or material  
 provided and to be provided: **\$1,085,000.00**

**PROOF OF SERVICE AFFIDAVIT**

I, Angela Familia, declare that I served copies of the above PRELIMINARY NOTICE (check appropriate box).

(a) ☐ By personally delivering copies to \_\_\_\_\_ at \_\_\_\_\_  
 (name(s) and title(s) of persons served)  
 On \_\_\_\_\_, at \_\_\_\_\_, m.  
 (date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address  
 shown above on January 4, 2017

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on January 4, 2017

Signature of person making service: 

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]

**CALIFORNIA PRELIMINARY NOTICE**

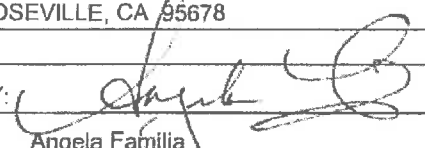
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**YOU ARE HEREBY NOTIFIED:**

**DATE: January 4, 2017**

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

I  
 N F Intech Mechanical Company LLC  
 D O I 7501 GALILEE ROAD  
 I R R ROSEVILLE, CA 95678  
 V M  
 I  
 D  
 U  
 A  
 L  
 BY:   
 Angela Familia  
 AP/AR Manager

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment

to perform HVAC work per

Subcontract dated 11/18/16,

Project # 161159, & Work Order 4700077375.

JOB NAME AND LOCATION PG&E VCOC-BLDG 4 CONST. HVAC

4940 ALLISON PARKWAY

VACAVILLE, CA 95688

Relationship to the parties

of the one giving this notice Subcontractor

THE NAME AND ADDRESS OF THE PERSON WHO CONTRACTED FOR THE PURCHASE OF (PRIVATE WORKS) OR WHO WILL BE FURNISHED (PUBLIC WORKS) SUCH LABOR, SERVICES, EQUIPMENT OR MATERIAL IS:

TURNER CONSTRUCTION COMPANY  
 1211 H STREET  
 SACRAMENTO, CA 95814

\*\*\*\*\* NOTICE TO PROPERTY OWNER \*\*\*\*\*

**EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL**, if the person or firm that has given you this notice is not paid in full for labor, service, equipment, or material provided or to be provided to your construction project, a lien may be placed on your property. Foreclosure of the lien may lead to loss of all or part of your property. You may wish to protect yourself against this by (1) requiring your contractor to provide a signed release by the person or firm that has given you this notice before making payment to your contractor, or (2) any other method that is appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a statement of your legal rights. This notice is not intended to reflect upon the financial condition of the contractor or the person employed by you on the construction project. If you record a notice of cessation or completion of your construction project, you must within 10 days after recording, send a copy of the notice of completion to your contractor and the person or firm that has given you this notice. The notice must be sent by registered or certified mail. Failure to send the notice will extend the deadline to record a claim of lien. You are not required to send the notice if you are a residential homeowner of a dwelling containing four or fewer units.

\*\*\*\*\*

✱ TO: OWNER, REPUTED Pacific Gas & Electric Company  
 OWNER OR 245 Market Street  
 PUBLIC ENTITY San Francisco, CA 94111

TO: DIRECT Turner Construction Company  
 CONTRACTOR OR 1211 H Street  
 REPUTED Sacramento, CA 95814  
 CONTRACTOR

TO: LENDER, NONE  
 REPUTED LENDER,  
 OR SURETY

TO: SUBCONTRACTOR NONE

TRUST FUNDS TO WHICH SUPPLEMENTAL FRINGE BENEFITS ARE PAYABLE:

Sheetmetal Workers of North.

CA Pension Trust Fund

(MATERIAL MEN NOT REQUIRED TO FURNISH THE ABOVE)

Estimated total price of the labor, services, equipment, or material  
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(a) ☐ By personally delivering copies to \_\_\_\_\_ at \_\_\_\_\_  
 (name(s) and title(s) of persons served)

On \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_, m.  
 (date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address shown above on January 4, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on January 4, 2017

Signature of person making service: 

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]



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**THIS IS NOT A LIEN. THIS IS NOT A REFLECTION ON THE INTEGRITY OF ANY CONTRACTOR OR SUBCONTRACTOR.**

**YOU ARE HEREBY NOTIFIED:**

**DATE: January 3, 2017**

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

I  
N F Intech Mechanical Company LLC  
D O I 7501 GALILEE ROAD  
I R R ROSEVILLE, CA 95678  
V M  
I  
D BY:  
U  
A Angela Familia  
L AP/AR Manager

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment  
to perform HVAC work per  
Subcontract dated 11/18/16, (4)  
Project # 161159, & Work Order 4700077375.

JOB NAME AND LOCATION: PG&E VCOC-BLDG 4 CONST. HVAC  
4940 ALLISON PARKWAY  
VACAVILLE, CA 95688

Relationship to the parties  
of the one giving this notice Subcontractor

THE NAME AND ADDRESS OF THE PERSON WHO  
CONTRACTED FOR THE PURCHASE OF (PRIVATE  
WORKS) OR WHO WILL BE FURNISHED (PUBLIC WORKS)  
SUCH LABOR, SERVICES, EQUIPMENT OR MATERIAL IS:

TURNER CONSTRUCTION COMPANY  
1211 H STREET  
SACRAMENTO, CA 95814

TO: OWNER, REPUTED Pacific Gas & Electric Company  
OWNER OR 245 Market Street  
PUBLIC ENTITY San Francisco, CA 94111

TO: DIRECT Turner Construction Company  
CONTRACTOR OR 1211 H Street  
REPUTED  
CONTRACTOR Sacramento, CA 95814

TO: LENDER, NONE  
REPUTED LENDER,  
OR SURETY

TO: SUBCONTRACTOR NONE

\*\*\*\*\* NOTICE TO PROPERTY OWNER \*\*\*\*\*

**EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL**, if the person or firm that has given you this notice is not paid in full for labor, service, equipment, or material provided or to be provided to your construction project, a lien may be placed on your property. Foreclosure of the lien may lead to loss of all or part of your property. You may wish to protect yourself against this by (1) requiring your contractor to provide a signed release by the person or firm that has given you this notice before making payment to your contractor, or (2) any other method that is appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a statement of your legal rights. This notice is not intended to reflect upon the financial condition of the contractor or the person employed by you on the construction project. If you record a notice of cessation or completion of your construction project, you must within 10 days after recording, send a copy of the notice of completion to your contractor and the person or firm that has given you this notice. The notice must be sent by registered or certified mail. Failure to send the notice will extend the deadline to record a claim of lien. You are not required to send the notice if you are a residential homeowner of a dwelling containing four or fewer units.

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provided and to be provided: **\$1,085,000.00**

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(a) ☐ By personally delivering copies to \_\_\_\_\_ at \_\_\_\_\_  
(name(s) and title(s) of persons served)  
On \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_ .m.  
(date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address shown above on \_\_\_\_\_.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on \_\_\_\_\_

Signature of person making service: \_\_\_\_\_

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]

# PRE-LIEN INFORMATION

217-05  
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<b>Project:</b>	<b>PG&amp;E VCOC Building 4 HVAC</b> <b>Project # 161159</b>
<b>Project Location:</b>	<b>4940 Allison Parkway</b> <b>Vacaville, CA 95668</b>
<b>General Contractor:</b>	<b>Turner Construction Company</b> 1211 H Street Sacramento, CA 95814  <b>Project Executive:</b> <b>Harry Smith</b> <b>916-201-9804</b>  <b>Project Manager:</b> <b>Drake Costa</b> <b>916-956-1206</b>
<b>Owner:</b>	<b>Pacific Gas &amp; Electric Company</b> <b>245 Market St.</b> <b>San Francisco, CA 94111</b>
<b>Construction Lender:</b>	<b>No</b>
<b>Bond:</b>	<b>None</b>
<b>Certified Payroll:</b>	<b>DCM Group</b> 333 University Ave, Suite 200 Sacramento, CA 95825 (P) 916.443-2100
<b>Accountant:</b>	<b>Janice Lacorte</b> Phone: 510.267.8163 email: <a href="mailto:jlacorte@tcco.com">jlacorte@tcco.com</a> invoices: <a href="mailto:ncapc@tcco.com">ncapc@tcco.com</a>

If you have any questions in reference to the information provided above, please contact  
Debbie DeVries @ 916-554-7930



## SUBCONTRACT WORK ORDER

### Turner Construction Company

<b>Subcontractor:</b> <b>Intech Mechanical Company LLC</b> <b>7501 Galilee Road, Roseville, CA, 95678</b>	<b>Office:</b> <b>Sacramento</b>	<b>Date:</b> <b>11/18/2016</b>	
	<b>Contract:</b> <b>PG&amp;E VCOC - Building 4</b>		<b>Project Number:</b> <b>161159</b>
	<b>Subcontract Work:</b> <b>HVAC</b>	<b>Sub#</b> <b>10111530</b>	<b>Work Order#</b> <b>4700077375</b>

The terms and conditions of the Master Subcontract dated 01/01/2015 shall govern this Subcontract Work Order (SWO) with the exception of those modifications listed below:

1. Project: **PG&E VCOC - Building 4 Construction**
2. Premises: **4940 Allison Parkway, Vacaville, CA, 95688**
3. Architect: DGA
4. Owner: **PG&E Corporation**
5. Date of General Contract: **10/04/2016**
6. Overhead Markup: **See Formula for Changes**
7. Profit Markup: **See Formula for Changes**
8. Reserve applicable to this SWO is as follows: **10.00%**
9. All invoices are to be identified to the above referenced SWO Number. Invoices are to be submitted to **Turner Construction Company**, located at **1211 H Street, Sacramento, CA, 95814**.
10. Insurance Requirements

\$1,085,000.00

1. Worker's Compensation in accordance with Laws of the State in which the Work is situated.
2. General Liability: **\$ 3,000,000.00** / combined single limit.  
General Aggregate: **\$ 3,000,000.00**

**X**. Subcontractor Election A). The above insurance coverages shall be provided by insurance companies selected by the Subcontractor.

or

\_\_\_\_\_. Subcontractor Election B). The above insurance coverages shall be provided through a consolidated insurance program (CCIP) arranged by **Turner Construction Company**. \$ \_\_\_\_\_ (The "Estimated Unburdened Payroll") warranted by Subcontractor as accurate for calculation of Insurance Premium for Subcontractor and enrolled Lower Tiers.

\_\_\_\_\_. Subcontractor Election B, Sub-Part B-1. Project utilizes a consolidated insurance program (CCIP) arranged by **Turner Construction Company**. Subcontractor is an Excluded Prime Tier with Enrolled Lower Tier Subcontractors. \$ \_\_\_\_\_ (The "Estimated Unburdened Payroll") warranted by Subcontractor as accurate for calculation of Insurance Premium for enrolled Lower Tiers.

or

\_\_\_\_\_. Subcontractor Election C). The above insurance coverages shall be provided through an Owner Controlled Insurance Program (OCIP.)

3. Automobile Liability : **\$ 1,000,000.00** / per accident